

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

BETHANY R. SCAER and STEPHEN :
SCAER, :

Plaintiffs, :

v. :

CITY OF NASHUA, a municipal :
corporation; JAMES W. DONCHESS, :
Mayor, City of Nashua, in his official and :
individual capacities; JENNIFER L. :
DESHAIES, Risk Manager, City of :
Nashua, in her official and individual :
capacities, :

Defendants. :

Case No.

DECLARATION OF ENDEL KOLDE
IN SUPPORT OF MOTION TO ADMIT COUNSEL *PRO HAC VICE*

I, Endel Kolde, declare as follows:

1. I am a senior attorney with the Institute for Free Speech, a nonprofit public interest law firm.
2. I submit this declaration in support of Roy S. McCandless' motion for my admission to practice *pro hac vice* in the above-captioned matter.
3. I will be associated with Roy S. McCandless in this matter.
4. I am a member in good standing of the bars of the State of Washington since 1995; District of Columbia since 2022; U.S. District Court for the Western District of Washington since 1995; U.S. District Courts for the

Northern and Western Districts of Texas since 2023; U.S. District Court for the District of Colorado since 2024; U.S. Courts of Appeals for the Ninth Circuit (2009), Eleventh Circuit (2021), Third Circuit (2021), Fifth Circuit (2022), Tenth Circuit (2022), and U.S. Supreme Court since 2018.

5. I am in good standing and eligible to practice in every jurisdiction and court in which I am admitted to practice, and I am not currently suspended or disbarred in any jurisdiction.
6. There are no pending disciplinary proceedings against me in any state or federal court, nor has any discipline ever been previously imposed on me.
7. I have not been convicted of a felony or misdemeanor.
8. I have not been censured, suspended, disbarred, or denied admission or readmission by any court.
9. I have never had *pro hac vice* status denied or revoked by any court.
10. My Washington State Bar number is 25155.
11. As a result, I respectfully request to be permitted to appear as counsel and advocate *pro hac vice* for Plaintiffs Bethany R. Scaer and Stephen Scaer.

Executed under penalty of perjury on September 5, 2024.

Dated: September 5, 2024.



Endel Kolde
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